

Exhibit 3

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August 8, 2023

BY EMAIL

Calvin Lee
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clee@milchev.com

Re: Azima v. Del Rosso, 20-cv-954 (M.D.N.C.) – Plaintiff’s Subpoena
Issued to Dechert LLP

Dear Mr. Lee,

We write on behalf of non-party Dechert LLP (“Dechert”) in the above-referenced action. By email, we are providing you with a link and credentials to download documents that we are producing in response to your Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action dated December 19, 2022 (“Subpoena”) and in keeping with the Court’s July 25 Order (ECF 248), which limited the relevant discovery period to March 2015 through October 15, 2020. The documents included in this production bear Bates numbers DECNC00000001-DECNC00009490. The documents in this production are designated “Confidential” pursuant to Paragraph 2 of the Protective Order dated February 22, 2023 (ECF 177).

Today, Dechert is producing documents responsive to all Requests. For the reasons outlined in Dechert’s Status Report on Discovery Efforts and Motion to Extend Deadlines (ECF 251), these documents cover the relevant time period up to August 31, 2020. Dechert will follow this production with a privilege log of withheld documents. In addition, Dechert will follow today’s production with rolling supplemental productions to complete its obligations pursuant to the Subpoena, subject to any forthcoming Court order regarding the scope of discovery.

This production is being made subject to the Protective Order. All documents included in the production are being produced only in the above-referenced action. Dechert’s production of documents is not intended to be a waiver of any of the objections set forth in its Responses and Objections to Plaintiff’s Subpoena. Further, in making this production, Dechert does not waive,

and intends to assert and maintain, all applicable privileges, including the attorney-client privilege, work-product, privilege, and common-interest privilege.

* * *

If you have any questions, please call me at (212) 763-0883 or email me at dgopstein@kaplanhecker.com.

Respectfully,



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